

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JEFFERY HEALEY,
Plaintiff

v

Docket #01-11099NG

ROBERT MURPHY, et al.,
Defendants

and

JOEL PENTLARGE, and
EDWARD GIVEN,
Plaintiffs

v

Docket #04-31077NG

ROBERT MURPHY, et al.,
Defendants

**PRO SE PLAINTIFF'S MOTION for INNER PERIMETER SECURITY to
ESCORT ALL COUNSEL, and EXPERTS ON A TOUR
OF THE NEMANSKET CORRECTIONAL CENTER**

Now comes the pro se Plaintiff, Edward Given in the above-entitled matter who respectfully moves this Honorable Court to grant this motion and issue an order that the Defendants schedule a tour of the Nemasket Correctional Center guided by the Inner Perimeter Security to observe first hand the unhealthy and dangerous conditions in which the pro se Plaintiff is imprisoned. In support thereof the pro se Plaintiff states:

1. that the pro se Plaintiff is incarcerated at the Nemasket Correctional Center and is in the direct custody

of the defendant Robert Murphy.

2. That by allowing the Inner Perimeter Security (IPS) to guide a tour of Counsel, and any consulting experts they may have throughout the Nemasket Correctional Center, the counsel and experts will observe first hand the actual unhealthy and dangerous conditions that exist, and that the pro se plaintiff is subjected to every hour of every day.


3. Whereas the co-plaintiff's and defense counsel are officers of the court, there will not be any security issues.

4. That the pro se Plaintiff has been employed in the highest security areas, he does not pose any security issues himself.

5. That by having the IPS conduct the tour, it will not create any need to interrupt the normal operations of the institution.

WHEREFORE, for the above stated reasons, the pro se Plaintiff prays this Honorable Court will grant his motion for Counsel and experts to tour the Nemasket Correctional Center and issue an order that the Defendants arrange such a tour at the earliest available time within thirty (30) days from this motion.

Respectfully Submitted,


Edward Given, pro se
30 Administration RD
Bridgewater MA 02324

Date: 5-5-08

CERTIFICATE OF SERVICE

I, Edward Given to hereby certify that I served a copy of this motion on defense counsel Mary Murray via intrafacility mail on this date: 5-5-08


Edward Given, pro se